

FILED

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division

2008 JUN 11 A 9:37

BETTY J. OSTERGREN,

Plaintiff,

v.

ROBERT F. McDONNELL, in his official
capacity as Attorney General of Virginia,

Defendants.

CLERK US DISTRICT COURT
RICHMOND, VIRGINIACivil No. 3:08cv362

**MOTION FOR TEMPORARY RESTRAINING ORDER
OR PRELIMINARY INJUNCTION**

The plaintiff, by counsel, hereby requests the Court to grant a temporary restraining order or preliminary injunction prohibiting the defendant from enforcing Va. Code. Ann. § 59.1-443.2, as amended by Acts 2008, ch. 562, against the plaintiff. The grounds for this Motion are set forth in the accompanying Memorandum.

The plaintiff further requests that the Court grant this Motion before July 1, 2008, when the above-mentioned amendment to § 59.1-443.2 will take effect.

Dated: June 11, 2008

Respectfully submitted,

BETTY J. OSTERGREN

By counsel:



Rebecca K. Glenberg (VSB No. 44099)
American Civil Liberties Union of Virginia
Foundation, Inc.
530 E. Main Street, Suite 310
Richmond, Virginia 23219
(804) 644-8080
(804) 649-2733 (FAX)
rglenberg@acluva.org